

**In the Matter of:**  
**MAGGIE RUSSELL**  
**VS**  
**MISS. GULF COAST COMMUNITY COLLEGE**

---

*RUSSELL, MAGGIE*

*March 29, 2023*

---

**eDeposition**  
.COM

844.533.DEPO

**EXHIBIT**

**"17"**

tabbles



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
                    SOUTHERN DIVISION

4 MAGGIE RUSSELL PLAINTIFF

5 VS. 1:22-CV-00086-TBM-RPM

6 MISSISSIPPI GULF COAST COMMUNITY  
COLLEGE through its Board of  
7 Trustees (in their official  
capacities) and DOES 1-20; inclusive DEFENDANTS

10 DEPOSITION OF MAGGIE RUSSELL

12 Taken at the offices of Boyce Holleman &  
Associates, 1720 23rd Avenue, Gulfport,  
13 Mississippi, on Wednesday, March 29, 2023,  
beginning at 10:30 a.m.

18 REPORTED BY:

19 Kati Vogt, RPR, RMR, RDR, CRR  
MS CSR #1557 NCRA #052536  
20 eDeposition Reporting Services  
Post Office Box 14148  
21 Jackson, Mississippi 39236  
kati.vogt@edeposition.com  
22 Mobile: (228) 860-5111  
844-533-3376

COAST ADDRESS:

25 Post Office Box 1048  
Biloxi, Mississippi 39533



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 2

1 A P P E A R A N C E S

2

3 REPRESENTING THE PLAINTIFF:

4 KEITH ALTMAN, ESQ.  
Law Office of Keith Altman  
5 33228 West 12 Mile Road  
Suite 375  
6 Farmington Hills, MI 48331  
keithaltman@kaltmanlaw.com

7

8 REPRESENTING THE DEFENDANT:

9 KRISTI ROGERS BROWN, ESQ.  
C. HUNTER SALAMONE, ESQ.  
10 Daniel Coker Horton & Bell, P.A.  
1712 15th Street, Suite 400  
11 Post Office Box 416  
Gulfport, Mississippi 39502  
12 kbrown@danielcoker.com  
hsalamone@danielcoker.com

13

HOLLIS TAYLOR HOLLEMAN, ESQ.  
14 Boyce Holleman & Associates, P.A.  
1720 23rd Avenue  
15 Gulfport, Mississippi 39501  
hollis@boyceholleman.com

16

17

ALSO PRESENT:

18

Jason Pugh

19

20

21

22

23

24

25



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 3

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

WITNESS: MAGGIE RUSSELL	PAGE:
Examination by Ms. Brown.....	5
Certificate of Court Reporter.....	55
Errata Sheet.....	56



1                                    S T I P U L A T I O N

2                    It is hereby stipulated and agreed by and  
3    between the parties hereto, through their  
4    respective attorneys of record, that this  
5    deposition may be taken at the time and place  
6    hereinbefore set forth, by Kati Vogt, RPR, RMR,  
7    CRR, RDR, Court Reporter and Notary Public,  
8    pursuant to the Federal Rules of Civil Procedure,  
9    as amended;

10            That the formality of reading and signing is  
11    specifically RESERVED;

12            That all objections, except as to the form of  
13    the questions and the responsiveness of the  
14    answers, are reserved until such time as this  
15    deposition, or any part thereof, may be used or is  
16    sought to be used in evidence.

17                                    - - -

18

19

20

21

22

23

24

25



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 5

1 MAGGIE RUSSELL,  
2 having been first duly sworn, was  
3 examined and testified as follows:

4 EXAMINATION

5 - - -

6 BY MS. BROWN:

7 Q. Good morning, Maggie. We met just a few  
8 minutes ago. My name is Kristi Brown, and I  
9 represent the community college in this lawsuit.

10 A. Okay.

11 Q. This is Hollis Holleman. He also  
12 represents the community college, and Hunter  
13 Salamone who works with me in my office and is here  
14 to help me today.

15 A. Okay.

16 Q. Okay. And I heard Keith tell you that  
17 this is the court reporter that's going to be  
18 taking down everything we say.

19 A. Uh-huh.

20 Q. And then Dr. Pugh is here from the  
21 college.

22 THE WITNESS: Hi.

23 BY MS. BROWN:

24 Q. I know you've probably never given a  
25 deposition before, have you?



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 6

1 A. No.

2 Q. Okay. This is going to be easy, because  
3 I'm asking you questions that you know the answer  
4 to.

5 A. Okay.

6 Q. And you just have to tell me what the  
7 answer is. Okay?

8 Can you state your full name for the  
9 record?

10 A. Maggie Susan Russell.

11 Q. Okay. Now, I'm going to ask you some  
12 questions. If you'll let me finish asking my  
13 question before you start answering so we don't  
14 talk over each other --

15 A. Okay.

16 Q. -- that will make it easier for our court  
17 reporter to get everything down.

18 A. Yes, ma'am.

19 Q. Okay. And you're doing great so far, but  
20 yeses and nos are good.

21 A. Yes, ma'am.

22 Q. Sometimes we say "nuh-uh" or "uh-huh,"  
23 but we can't read what those mean later.

24 A. Right.

25 Q. I'll try to remind you, because everybody



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 7

1       does it.   Okay?

2           A.    Yes, ma'am.

3           Q.    Thank you.

4                   Now, I'm going to ask you questions.   If  
5   you don't understand a question I ask you, tell me  
6   you don't understand it, and I'll try to ask it a  
7   different way.   Okay?

8           A.    Yes, ma'am.

9           Q.    You're not going to hurt my feelings.  
10   You're not being rude if you tell me you don't  
11   understand my question, because sometimes I ask bad  
12   questions.

13          A.    Yes, ma'am.

14          Q.    Okay.   Is there any reason that you can't  
15   answer questions for me today?

16          A.    No, ma'am.

17          Q.    Okay.   Have you had any medicine today?

18          A.    Yes.

19          Q.    Would that medicine affect your ability  
20   to answer my questions?

21          A.    No, ma'am.

22          Q.    Okay.   What is your current address?

23          A.    153 --

24                   MR. ALTMAN:   Wait, hold on one second.

25                   Can we not put that directly on the



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 8

1 transcript? Can we get that -- just get that  
2 to you? I just hate having people's  
3 identifying information on the transcript.

4 MS. BROWN: Sure.

5 MR. ALTMAN: We'll -- if you want to  
6 give it to her right now off the record --

7 MS. BROWN: Okay.

8 MR. ALTMAN: -- then go ahead. But just  
9 off the record for the address, if that's  
10 okay.

11 MS. BROWN: Sure.

12 (Off the record.)

13 BY MS. BROWN:

14 Q. Okay. That's in Harrison County?

15 A. Yes, ma'am.

16 Q. Okay. Have you lived in Harrison County  
17 your whole life?

18 A. Yes, ma'am.

19 Q. How old are you?

20 A. I'm 25.

21 Q. Okay. What's your birthday?

22 A. July 9th.

23 Q. Of what year?

24 A. 1997.

25 Q. Okay. Do you know how long you've lived



1 at that house where you just gave me the address?

2 A. At least two years, that I believe.

3 Q. Okay. But before that, you still lived  
4 in Gulfport?

5 A. Yes.

6 Q. Okay. You -- who lives at that house  
7 with you?

8 A. My mom and my dad and my cat.

9 Q. Okay. What's your mom's name?

10 A. Susan Carol Russell.

11 Q. What's your dad's name?

12 A. Bobby Max Russell, Jr.

13 Q. And what's your cat's name?

14 A. Smokey.

15 Q. Okay. Does your mom work outside the  
16 home?

17 A. No, ma'am.

18 Q. Does your dad?

19 A. He does work. He used to be in the Air  
20 Force, but now he's a civilian computer person.

21 Q. Okay. So he worked -- does he work from  
22 home?

23 A. He doesn't work from home. He goes to  
24 the base every day to fix computers.

25 Q. Okay. At Keesler?



1           A.     Not at Keesler. I think -- it's the  
2     one -- the base by Gulfport.

3           **Q.     The Seabee base?**

4           A.     Yeah, I think -- wait, no. That's not  
5     the Seabee base. I am sorry. I forgot the name of  
6     the base, but it's by the airport.

7           **Q.     Okay. Then the National Guard base. I**  
8     **don't know the name of it either. And you don't**  
9     **have to be sorry for forgetting that.**

10                   Now, you grew up or lived in Harrison  
11    County. At some point you lived in Biloxi?

12           A.     Yes.

13           **Q.     Is that where you went to high school?**

14           A.     Yes.

15           **Q.     Where did you go to elementary school?**

16           A.     I went to two different elementary  
17    schools. One was in Bayou View, which was in  
18    Gulfport, before Hurricane Katrina struck. And  
19    then after Katrina, we moved to Biloxi, and I went  
20    to Popps Ferry.

21           **Q.     Okay. Where did you go to middle school?**

22           A.     Biloxi Junior High.

23           **Q.     Okay. And then to Biloxi High School?**

24           A.     Yes, ma'am.

25           **Q.     And those are -- are those the only**



1 schools you went to before you graduated from high  
2 school?

3 A. Yes, ma'am.

4 Q. What year did you graduate from high  
5 school?

6 A. 2015.

7 Q. When you were at Bayou View, do you  
8 remember did you have tutors and help at school?

9 A. Yes, ma'am.

10 Q. Okay. So you've had that since you  
11 started in kindergarten?

12 A. Yes.

13 Q. Okay. Do you know what the reason you  
14 had tutors at school was?

15 A. I can remember that my hand coordination  
16 was really bad, that I couldn't hold straws. And I  
17 couldn't speak more than 25 words.

18 Q. Okay.

19 A. And basically I just remember speech  
20 classes and getting classes for my hand  
21 coordination.

22 Q. Was that like a therapist that helped you  
23 with your coordination?

24 A. Yes, ma'am.

25 Q. And a speech therapist?



1 A. Yes, ma'am.

2 Q. Do you -- did you have any other  
3 therapist or counselor maybe that you talked to?

4 A. I don't remember. I'm sorry.

5 Q. It's okay.

6 What was your favorite subject in  
7 elementary school?

8 A. Art.

9 Q. Art? Yeah? I bet that's going to be the  
10 same answer all the way through school, isn't it?

11 A. Yes, ma'am.

12 Q. Do you like to read?

13 A. I do.

14 Q. What kind of books do you like to read?

15 A. I like to read mythology books, science  
16 fiction books, anything that has imagination, and  
17 like to be creative.

18 Q. Okay. Do you read those books and then  
19 draw pictures from them?

20 A. Yes, ma'am.

21 Q. Do you know what an individualized  
22 education plan is?

23 A. I do not know that, ma'am.

24 Q. Okay. Do you know -- I know you said you  
25 had trouble with hand-eye coordination and speech.



1 A. Yes, ma'am.

2 Q. Do you know of any other learning  
3 disabilities that you have?

4 A. Yes, ma'am.

5 Q. What are those?

6 A. I have trouble with math. I can't do  
7 measurements. I can't really drive because of my  
8 sensory, loud noises, fear of people. I've been  
9 through a lot, honestly.

10 Q. Okay. Tell me about the loud noises. Is  
11 it car horns or --

12 A. Car horns, loud noises like construction  
13 work. Basically those things.

14 Q. Okay.

15 A. Like, really loud noises.

16 Q. And you've always had that fear?

17 A. Yes.

18 Q. Okay. And you said fear of people?

19 A. Yes.

20 Q. Have you always had that fear?

21 A. Yes.

22 Q. Being in crowds?

23 A. Yes.

24 Q. Okay. You do okay at school in, like,  
25 the hallway?



1           A.     Not really, but I had to put on a brave  
2     face.

3           Q.     Okay.   What about in the classroom when  
4     it was just you and your other classmates?

5           A.     I got bullied a lot in school.

6           Q.     Yeah?

7           A.     Yeah.

8           Q.     Was that tough?

9           A.     It is.

10          Q.     It's okay.

11          A.     I'm sorry.

12          Q.     No, no reason to apologize.

13                 MR. ALTMAN:   You're doing great.

14     BY MS. BROWN:

15          Q.     You're doing a great job.

16          A.     Thank you.

17          Q.     I'm just trying to learn some  
18     information, okay?   I'm not here to upset you.

19          A.     No problem.   It's just talking about my  
20     past is painful.

21          Q.     I understand.

22                 So you said you had trouble with math?

23          A.     Yes.

24          Q.     Did you get help at school with math?

25          A.     Yes.   I stayed after school with tutors.



1 Q. Okay. When you were in high school and  
2 you stayed after school, who was your tutor?

3 A. Mr. Garrett. Matthew Garrett.

4 Q. Okay.

5 A. He was really nice.

6 Q. Yeah? Did he help you a lot?

7 A. He did.

8 Q. Was he your tutor all through high  
9 school?

10 A. Mostly tenth grade through junior, like  
11 11th grade, because at the time, we were supposed  
12 to take these tests with SATPs and all that stuff.

13 Q. So he was helping you get ready for those  
14 tests?

15 A. Yes.

16 Q. Okay. Did you take those tests?

17 A. Yes. And I failed.

18 Q. Yeah?

19 A. Miserably.

20 Q. How many times did you take it?

21 A. Four times that I can remember.

22 Q. And you just couldn't pass any of those  
23 times?

24 A. No.

25 Q. But you were able to graduate from high



1 school?

2 A. Yes.

3 Q. Do you know how that happened?

4 A. Because there was a new law that says  
5 that if you pass three out of four, then I was able  
6 to graduate. And I was able to pass my English and  
7 science and history.

8 Q. Okay. Did you have any other math tutors  
9 in high school besides Mr. Garrett?

10 A. My Special Ed teacher.

11 Q. Who was that?

12 A. She helped me with the math. Ms. Barnes.

13 Q. Okay. Do you happen to know what doctor  
14 or psychologist diagnosed you with your learning  
15 disabilities?

16 A. No, ma'am.

17 Q. In high school were you in regular math  
18 classes with the tutor, or did you have special  
19 math classes?

20 A. Regular, even though they knew about my  
21 disabilities.

22 Q. But you had the tutor?

23 A. Yes.

24 Q. Okay. Took lots of art classes in high  
25 school?



1 A. Yes, ma'am. Art is my life.

2 Q. Yeah?

3 A. Yes.

4 Q. Do you like to draw with crayons or  
5 colored pencils or paint?

6 A. I like to do multiple mediums. I do  
7 colored pencils, acrylics, oil pastels, ink pens,  
8 like black ink. Those are my favorite ones.

9 Q. Okay. Do you remember what you made in  
10 Algebra I in high school, what your grade was?

11 A. All I remember is it was a very low  
12 grade; but I don't know the number specifically.

13 Q. Do you remember taking Algebra II your  
14 senior year of high school?

15 A. Yes.

16 Q. Do you remember what your grade was?

17 A. It was below 70.

18 Q. But it was passing?

19 A. Barely.

20 Q. You worked hard to get through that,  
21 though, didn't you?

22 A. I did my best.

23 Q. Were you proud of yourself for getting  
24 through that?

25 A. Yeah.



1 Q. Yeah.

2 Do you know who Mr. -- and I'm probably  
3 going to mispronounce his name -- Dedual?

4 A. Yes, I know him.

5 Q. Who is he?

6 A. I met him through my Aunt Debbie, and he  
7 helped me in college, tutoring.

8 Q. Okay. Did he help you in high school at  
9 all?

10 A. During my senior year.

11 Q. Okay.

12 A. He was offering tutoring.

13 Q. Okay. Was that outside of school, like  
14 after -- at home?

15 A. Not at home, but at the college.

16 Q. Okay.

17 A. He helped me with the numbers.

18 Q. Okay. Did he work at the college?

19 A. He did.

20 Q. Okay. Did he teach any of your classes  
21 at the college?

22 A. No.

23 Q. Never had him as a teacher?

24 A. No, ma'am.

25 Q. Do you remember taking the ACT?



1 A. Yes.

2 Q. Did you -- how many times did you take  
3 it?

4 A. Three times that I can remember.

5 Q. Do you remember what your scores were?

6 A. I remember one of them. And it was,  
7 like, 15.

8 Q. Yeah?

9 A. Yeah.

10 Q. Do you -- did you ever look at the report  
11 to see what you scored on the language portion?

12 A. I remember only looking at one report,  
13 and it said all of my weaknesses, and it made me  
14 feel really bad.

15 Q. Okay. So when you were in high school,  
16 did you plan on going to college?

17 A. Yes.

18 Q. Okay. So when you were in high school,  
19 your goal was to go to college?

20 A. Yes.

21 Q. And did you have a college you really  
22 wanted to go to?

23 A. Not really. I just wanted to go to  
24 college to expand my knowledge on art.

25 Q. Did you look at art schools?



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 20

1 A. No, ma'am.

2 Q. Okay. Did you want to stay close to  
3 home?

4 A. Yes.

5 Q. Okay. So did you only apply to  
6 Mississippi Gulf Coast Community College?

7 A. Yes.

8 Q. Okay. And you were accepted?

9 A. Yes.

10 Q. Was that an exciting day?

11 A. It was.

12 Q. Yeah?

13 A. It was a great day.

14 Q. When did you start at Mississippi Gulf  
15 Coast Community College?

16 A. August 2015. I remember because it was a  
17 few months after I graduated high school.

18 Q. So you graduated from high school in the  
19 spring, and then you had summer --

20 A. May, yeah.

21 Q. In May? And then you had summer  
22 vacation?

23 A. Yes.

24 Q. And then you started college in the fall?

25 A. Yes.



1 Q. And were you excited about going to  
2 college or were you scared about going to college?

3 A. It was a bit of both.

4 Q. Yeah?

5 A. Happy and scared.

6 Q. Okay. Did you take a tour of the campus  
7 before you started?

8 A. Yes.

9 Q. Tell me about the tour of the campus.

10 A. Ms. Aimee, my counselor at the time, she  
11 gave me a good tour of the college.

12 Q. Is that Ms. Aimee McGehee?

13 A. Yes, ma'am.

14 Q. Okay. So she showed you around?

15 A. Yes.

16 Q. You don't drive?

17 A. No, ma'am.

18 Q. So how did you get to school?

19 A. My mom always drove me to school.

20 Q. And she would drop you off?

21 A. Yes.

22 Q. And then were you able to navigate or  
23 make your way around campus?

24 A. Yes, because I have a little map with me.

25 Q. So you could tell which buildings your



1 classes were in?

2 A. Yes, ma'am.

3 Q. And how to get there?

4 A. Yes.

5 Q. Okay. How many classes did you take in  
6 the fall of 2015?

7 A. I don't know. I don't remember. I'm  
8 sorry.

9 Q. It's okay.

10 When you were registering and went to  
11 school, did you take just one or two classes a  
12 semester, or did you take a full load?

13 A. I believe it was full load.

14 Q. So like three or four classes?

15 A. Yes, ma'am.

16 Q. Okay. Did you take any math classes your  
17 first year of college?

18 A. I don't remember.

19 Q. Okay.

20 A. It's been a long time.

21 Q. I know it has. It has. It's been almost  
22 ten years.

23 What was your goal when you went to  
24 college?

25 A. I wanted to be an art therapist



1 originally, but my plans have changed.

2 Q. What are they now?

3 A. I want to make more books, kids' stories.

4 That's what I'm passionate about.

5 Q. When did you change that plan?

6 A. I think it was two years ago.

7 Q. And is it -- did you change because that  
8 was what your passion was?

9 A. Yes.

10 Q. Any other reason for that change?

11 A. No.

12 Q. Okay. You said "more books." Have you  
13 made a book?

14 A. I made a book called Artism and Me,  
15 Autism Within My Heart in Color, back in 2019.

16 Q. And did you write the book or just  
17 draw -- is it a picture book?

18 A. It's a picture book. And I wrote it  
19 myself, and I illustrated it myself.

20 Q. That's really cool.

21 A. Thank you.

22 Q. And did it get published?

23 A. It did. It's on Amazon, Kobo, Google  
24 Play, 120 different websites.

25 Q. Wow. Do you know how many copies of that



1 book you've sold?

2 A. No, ma'am.

3 Q. No? Do you -- you've made some money  
4 from that book?

5 A. A little bit.

6 Q. Do you know how much?

7 A. No, ma'am.

8 Q. Okay. Who takes care of the money?

9 A. I -- my parents.

10 Q. So mom and dad know how much money you've  
11 made from that book?

12 A. Yes.

13 Q. Okay. What does an art therapist do?

14 A. They use art to help other people who  
15 have been in bad situations or traumatic  
16 situations.

17 Q. Okay. Do you know is that a four-year  
18 degree, to be an art therapist?

19 A. I believe so.

20 Q. Okay. Where were you going to go get  
21 that degree?

22 A. Originally I wanted to go to William  
23 Carey, but I changed my mind.

24 Q. When did you change your mind?

25 A. Before I was going to get my college



1 degree from MGCCC.

2 Q. So sometime while you were at MGCCC, you  
3 changed your mind about going to William Carey?

4 A. Yes.

5 Q. Did you ever visit William Carey?

6 A. I did.

7 Q. Okay. Is that what made you change your  
8 mind?

9 A. Yes. I realized that my limitations,  
10 it's gotten too hard for me.

11 Q. Tell me about that. What limitations?  
12 How has it gotten hard?

13 A. I have reading comprehension, which is  
14 basically I read something on paper, like, multiple  
15 times and I still don't understand it.

16 Q. Okay. So has it always been that way, or  
17 is that getting worse?

18 A. It's always been that way, and it's  
19 getting worse.

20 Q. Okay. Did you have help from tutors when  
21 you were in high school and at Mississippi Gulf  
22 Coast?

23 A. Yes.

24 Q. With reading and reading comprehension?

25 A. Yes.



1 Q. Okay. Are you working on another book?

2 A. Yes.

3 Q. Have you talked to a publisher about  
4 publishing another book?

5 A. Not yet, but I hope so soon.

6 Q. Can you tell me what the name of that  
7 book -- the new book is?

8 A. The book title, I haven't come up with a  
9 name yet, but it's going to be about birds and  
10 flowers from all 50 states of America.

11 Q. And you're drawing those?

12 A. I drew 25 illustrations so far.

13 Q. Okay. Twenty-five flowers, 25 birds?

14 A. They're all in one paper.

15 Q. Okay.

16 A. One state bird and one state flower of  
17 the same state in the same picture.

18 Q. On the same piece of paper?

19 A. Yes.

20 Q. Are you going alphabetically or just  
21 picking a stick?

22 A. Just picking a stick. It makes it fun  
23 that way.

24 Q. Yeah?

25 A. Yeah.



1           Q.    Do you just look at the map and decide  
2   which one's next?

3           A.    Yes.

4           Q.    Have you done Mississippi?

5           A.    Yes, I have.

6           Q.    Yeah? Is that the first one you did?

7           A.    Yes, that was the very first thing.

8           Q.    Yeah?

9                   Which one is your favorite state flower?

10          A.    So far, besides our state, it's Alabama.

11          Q.    What is their state flower?

12          A.    Woodpecker and a red flower.

13          Q.    Yeah?

14          A.    I don't remember the name of the red  
15   flower, but I do know Alabama's the only state that  
16   has woodpecker as their state bird.

17          Q.    Yeah?

18          A.    Yes.

19          Q.    Is that fun to draw?

20          A.    It is.

21          Q.    Does it have a red head?

22          A.    It has little yellow wings and spots,  
23   actually.

24          Q.    Okay. Not a red-headed woodpecker?

25          A.    No.



1 Q. Okay. Do you like birds and flowers?

2 A. I do.

3 Q. Do you sit outside and watch the birds?

4 A. Yes, ma'am.

5 Q. Do y'all have a hummingbird feeder at  
6 your house?

7 A. Yes, ma'am.

8 Q. Yeah?

9 A. We just got it yesterday.

10 Q. Yeah? It's time for those, isn't it?

11 A. Yes, ma'am.

12 Q. Do you plant flowers with Mom?

13 A. Dad, actually.

14 Q. Oh, with Dad?

15 A. Yeah.

16 Q. What kind of flowers did you plant?

17 A. We plant sunflowers and poppies and  
18 daisies and lilies.

19 Q. Yes?

20 A. Those kind of flowers.

21 Q. Do you just watch them in the yard, or do  
22 you cut them and bring them inside?

23 A. I watch Dad plant them first, and then I  
24 help water them.

25 Q. Yeah?



1 A. Yes.

2 Q. They haven't started blooming yet, have  
3 they?

4 A. No.

5 Q. No?

6 A. Not yet.

7 Q. Not time. Do you and Dad do anything  
8 else besides plant flowers and water them?

9 A. We watch movies together.

10 Q. Yeah?

11 A. Yes.

12 Q. What kind of movies?

13 A. We watch Avengers and all that good  
14 stuff.

15 Q. What's your favorite movie?

16 A. My favorite all time movie is Thor.

17 Q. Yes?

18 A. Yes, ma'am.

19 Q. When you started at Mississippi Gulf  
20 Coast Community College, did you declare a major?

21 A. Oh, yes. I always wanted to be an artist  
22 from day one, the moment I picked up a crayon.

23 Q. Yeah?

24 A. Yes, ma'am.

25 Q. You knew when you went to college, you



1     were going to have to take some more math classes,  
2     right?

3             A.     Yes.

4             Q.     Okay. And we talked about Ms. Aimee a  
5     minute ago. She was your counselor?

6             A.     Yes, ma'am.

7             Q.     And did you talk to her about the math  
8     classes?

9             A.     Yes.

10            Q.     Okay. Did you know that you were going  
11    to have to take College Algebra to get a degree?

12            A.     Yes.

13            Q.     Yes? Did you enroll in College Algebra?

14            A.     Yes.

15            Q.     Do you remember who your teacher was?

16            A.     I only remember my Intermediate Algebra  
17    teacher, Mr. McLendon.

18            Q.     Okay. Did you like him?

19            A.     I like him a lot. He was very nice.

20            Q.     Did you pass that class?

21            A.     Yes.

22            Q.     Okay.

23                    THE WITNESS: Mr. Keith, is it okay if I  
24    take a break for a moment?

25                    MS. BROWN: Absolutely it is.



1 MR. ALTMAN: Sure.

2 THE WITNESS: I'm going to the restroom.

3 MR. ALTMAN: Okay.

4 THE WITNESS: I'll be right back.

5 MS. BROWN: We'll take a comfort break.

6 THE WITNESS: Thank you.

7 (Off the record.)

8 BY MS. BROWN:

9 Q. I don't think we're going to be all that  
10 much longer. Okay?

11 A. Okay.

12 Q. But you're doing a great job so far.

13 A. Thank you. I'm just really nervous.

14 Q. I know it. I know. Because you've never  
15 done this before. But you're doing really well.

16 A. Thank you.

17 Q. Okay. So you passed Mr. McLendon's  
18 class?

19 A. Barely.

20 Q. Do you remember your grade?

21 A. No, ma'am.

22 Q. Okay. Do you remember enrolling in a  
23 College Algebra class that was four hours?

24 A. Yes, ma'am.

25 Q. That -- do you know that it was College



1     **Algebra 1314? Did you know that?**

2             A.     No, ma'am.

3             **Q.     Okay. In that four-hour class, how was**  
4     **it different? Do you remember how it was different**  
5     **than a regular class?**

6             A.     Oh, yes, I remember. It was the summer  
7     class.

8             **Q.     Okay.**

9             A.     And the teacher was not very nice. He --  
10    he spent most of his time arguing with the other  
11    kids instead of teaching us. And when I did do a  
12    math test, he ignored my disabilities and said, you  
13    know, try again, with even more questions on them,  
14    even though my accommodation said less questions,  
15    reduce the number.

16            **Q.     Okay. Do you remember the name of that**  
17    **teacher?**

18            A.     No, ma'am. I'm sorry.

19            **Q.     That's okay.**

20                    **Did you talk to Ms. Aimee about that**  
21    **class?**

22            A.     Yes, ma'am.

23            **Q.     Do you remember what you talked to her**  
24    **about?**

25            A.     I told her about how the teacher was not



1 very nice.

2 Q. Okay. What did she say?

3 A. She told me I could withdraw anytime, and  
4 I did.

5 Q. Okay. Did she talk to you -- did you  
6 talk to her about the accommodations for that  
7 class?

8 A. Yes.

9 Q. What were your accommodations?

10 A. I -- my -- I'm supposed to have the  
11 questions read out loud by the teacher or  
12 instructor, because of reading comprehension; I'm  
13 allowed to have a calculator next to me; and the  
14 numbers of the problems are supposed to be reduced.

15 Q. Okay. Meaning you're not supposed to  
16 have as many questions on your test?

17 A. Correct.

18 Q. Who told you that?

19 A. My accommodations. It's been like that  
20 for my entire life with my IEP.

21 Q. Okay. Do you know what an IEP is?

22 A. I know the gist of it, but really I don't  
23 understand it.

24 Q. Okay. Did Ms. Aimee read the questions  
25 out to you for a lot of your tests?



1 A. Yes.

2 Q. All of your tests, or just some of them?

3 A. All of my tests.

4 Q. Okay. So she read your questions for  
5 your College Algebra?

6 A. Yes.

7 Q. Okay. When she was reading them, did you  
8 ask her about the number of questions?

9 A. Yes.

10 Q. And --

11 A. I -- I'm sorry.

12 Q. It's okay. I interrupted you. Go ahead.

13 A. I was about to say yes, she read, you  
14 know, all the questions, and I asked her a lot of  
15 questions about them.

16 Q. Okay. Do you remember -- you withdrew  
17 from that class?

18 A. Yes.

19 Q. Do you remember how long you were in the  
20 class before you withdrew?

21 A. I don't remember.

22 Q. Okay. Did you talk to Ms. Aimee about  
23 what you could do other than College Algebra?

24 A. Yes.

25 Q. Did you ask her for additional



1 accommodations?

2 A. Yes.

3 Q. What did you ask her for?

4 A. I asked her about pencil and paper. Some  
5 of the tests were, like, on computer, and I didn't  
6 like that.

7 Q. Okay. And what did she say when you  
8 asked about pencil and paper?

9 A. She said that she'll get me some pencil  
10 and paper.

11 Q. Did she do that?

12 A. Yes.

13 Q. Okay. Any other requests for  
14 accommodations?

15 A. No.

16 Q. Just the pencil and paper?

17 A. Yes.

18 Q. Okay. Did you ever talk to Ms. Aimee or  
19 anybody at the college about waiving College  
20 Algebra?

21 A. Yes.

22 Q. Okay. Were you asking that it be waived,  
23 or were you asking for a supplement or a different  
24 course?

25 A. Originally it was supposed to be a



1 different course, but...

2 Q. And what happened when you asked for a  
3 different course?

4 A. It turns out it had more math that I  
5 wasn't really able to do.

6 Q. What did?

7 A. It was Quantitative Reasoning, which is  
8 like web design, but was more math, like calculus.

9 Q. Did you take Quantitative Reasoning?

10 A. I didn't take it.

11 Q. Did you sign up for it at all?

12 A. No, ma'am.

13 Q. Okay. So you rejected that class?

14 A. Yes, ma'am.

15 Q. Did they offer you Physical Science?

16 A. Yes.

17 Q. Did you take that class?

18 A. There's -- I don't remember. I'm sorry.

19 Q. That's okay.

20 A. It's been such a long time ago.

21 Q. But they offered you several different  
22 options, correct?

23 A. Yes. Yes.

24 Q. And did you pick one of those options?

25 A. I did take the Economics.



1 Q. Okay. So you took Economics?

2 A. Yes.

3 Q. And if I told you that you took Physical  
4 Science, you just don't remember, would you agree  
5 with there?

6 A. Yeah, I just don't remember.

7 Q. Okay. And there was one more class you  
8 needed to take, right?

9 A. Yes.

10 Q. What was that?

11 A. I don't remember.

12 Q. Visual Basic programming?

13 A. That sounds familiar.

14 Q. Okay. And you never signed up for that  
15 class, right?

16 A. No, ma'am.

17 Q. Why not?

18 A. Because it had more algebra in it, and my  
19 brain is basically finished with numbers.

20 Q. You didn't try to take the class, though,  
21 right?

22 A. Right. Yes.

23 Q. Okay. You knew you had to do that to get  
24 a degree from Mississippi Gulf Coast Community  
25 College, right?



1 MR. ALTMAN: Objection; form. You can  
2 answer.

3 A. Yes.

4 BY MS. BROWN:

5 Q. Okay. And we're here today because you  
6 filed a lawsuit against the college because you  
7 didn't get a degree, right?

8 A. Right.

9 Q. Okay. And did you do everything you  
10 needed to do to get a degree?

11 A. Yes.

12 Q. How do you think that?

13 A. I worked on my art classes. I...

14 MR. ALTMAN: Take it easy. Relax.  
15 Relax.

16 A. I tried math tutors. I tried  
17 after-college school tutors. And the numbers still  
18 keep swimming in papers. I just know I tried.

19 BY MS. BROWN:

20 Q. And you did really well, right?

21 A. I did.

22 Q. But you've got one more class you need to  
23 take. Would you be willing to take that one last  
24 class?

25 A. I can't take any more.



1 Q. You don't want to take any more classes?

2 A. No, ma'am.

3 Q. Don't want to go to college any more?

4 A. No, ma'am.

5 Q. And you don't plan to go anywhere else to  
6 college?

7 A. No, ma'am.

8 Q. Okay. When you talked to Ms. McGehee --  
9 Ms. Aimee about your accommodations, was she always  
10 helpful?

11 A. She was.

12 Q. Okay. Do you remember going to the  
13 Office of Civil Rights?

14 A. Yes.

15 Q. Can you tell me about that?

16 A. The OCR. They were responding to, you  
17 know, our complaint, and they were trying to do,  
18 you know -- do their job, but it's another --

19 Q. Here you go, sweetie.

20 A. Thank you. I'm sorry.

21 Q. No, don't apologize?

22 MR. ALTMAN: Relax.

23 A. I'm sorry.

24 BY MS. BROWN:

25 Q. Take a deep breath.



1           A.     Okay.   So yes, we did the OCR.

2           Q.     Okay.   And you made a complaint?

3           A.     Yes.

4           Q.     Did you ever make a complaint to the  
5 college?

6           A.     Yes.

7           Q.     Did you make that complaint or did your  
8 mom?

9           A.     Mom did on my behalf because I'm not good  
10 with that kind of paperwork and...

11          Q.     So you went to the OCR, and what did they  
12 do for you?

13          A.     On the telephone mostly.

14          Q.     Okay.

15          A.     We didn't go to their physical office,  
16 but we did through emails and phone.

17          Q.     Okay.   What did you tell them?

18          A.     I told them about my struggles with math  
19 and my autism and disabilities.

20          Q.     And what did you tell them you wanted?

21          A.     I wanted my degree.   I wanted other  
22 options than just College Algebra.

23          Q.     Okay.   And you were given other options  
24 besides College Algebra, right?

25          A.     Yes.



1           Q.    Okay.  What did the OCR tell you about  
2   your complaint?

3           A.    They told me that they would talk to  
4   MGCCC about it.

5           Q.    Okay.  Do you know if they did?

6           A.    They did.  But they never really told me  
7   about the resolution agreement.

8           Q.    Okay.  Who never told you?

9           A.    The OCR.

10          Q.    Okay.  But you know there was a  
11   resolution agreement?

12          A.    Yes.

13          Q.    How do you know that?

14          A.    My mom told me.

15          Q.    Did you get a letter in the mail about  
16   it?

17          A.    Yes.

18          Q.    Who was that letter from?

19          A.    I -- I don't remember.  I'm sorry.

20          Q.    It's okay.

21                Do you know what the agreement was?

22          A.    Yes.

23          Q.    What was it?

24          A.    I only remember bits and pieces, but I  
25   remember it was about four options on the



1 resolution agreement, each with different classes,  
2 and all of them the same with algebra and different  
3 math.

4 Q. Did you ever pick one of those options?

5 A. Just the one with the Economics.

6 Q. So you picked the option with Economics?

7 A. Yes.

8 Q. And you went and took that class, right?

9 A. I did.

10 Q. Did you tell the guy at OCR or the person  
11 that you were communicating with at OCR that you  
12 picked that option?

13 A. All I remember is -- yes, and the person  
14 I communicated with was Craig Nydick.

15 Q. Craig Nydick?

16 A. That's all I remember.

17 Q. Did you tell Craig that you picked the  
18 option with Economics?

19 A. Yes.

20 Q. Okay. And so you -- do you know if Craig  
21 told the college you made a choice?

22 A. I don't know.

23 Q. Okay. After you told Craig that you  
24 picked that option, you went back to school and  
25 took Economics. Is that the only class you took



1       that semester?

2           A.     Yes.

3           Q.     Okay. Was there another class you needed  
4       to take under that option?

5           A.     I don't remember.

6           Q.     Okay. Do you remember anything about  
7       prerequisites for any of those classes?

8           A.     The name sounds familiar.

9           Q.     Do you know what that means,  
10       "prerequisite"?

11          A.     No, ma'am.

12          Q.     Okay. Did you talk to Ms. Aimee about  
13       the option you selected?

14          A.     Yes.

15          Q.     Okay. Can you -- do you remember that  
16       conversation?

17          A.     No, ma'am. It's been a long time ago.

18          Q.     Okay. But Ms. Aimee was going to help  
19       you get through those options?

20          A.     Yes.

21          Q.     Okay. Now, at some point you stopped  
22       talking to Mr. Craig at OCR and went to Mississippi  
23       Disability Rights. Do you remember that?

24          A.     Yes.

25          Q.     Do you know why you did that?



1           A.     Yes.    Because the OCR wasn't very nice  
2   people.

3           **Q.     Who wasn't very nice?**

4           A.     Mr. Craig.

5           **Q.     Why wasn't he nice?**

6           A.     He screamed at me over voice mail.

7           **Q.     What did he scream at you?**

8           A.     He screamed at me for not trying hard  
9   enough.

10          **Q.     Is that because you didn't take that last**  
11 **class?**

12          A.     Right.

13          **Q.     Okay.   Do you still have that voice mail?**

14          A.     I don't think so, for me; but my mom may  
15   know.

16          **Q.     Okay.   When you went to Mississippi**  
17 **Disability Rights, what happened there?**

18          A.     They tried to help us with, you know,  
19   research.

20          **Q.     Okay.   Did you tell them that you had**  
21 **selected a resolution agreement?**

22          A.     I don't remember.

23                   MR. ALTMAN:   Objection; form.   Sorry.

24   BY MS. BROWN:

25          **Q.     Did you tell Mississippi Disability**



1 Rights about the resolution agreement with the OCR?

2 A. Yes, I think.

3 Q. Okay. And then what did Mississippi

4 Disability Rights do for you?

5 A. They tried to help us.

6 Q. How did they try to help you?

7 A. They did more research into Mississippi  
8 laws about disabilities.

9 Q. Okay. Anything else?

10 A. That's all I can remember.

11 Q. Who did you talk to at Mississippi

12 Disability Rights?

13 A. My mom did most of the communication, but  
14 I don't remember the lady's name.

15 Q. Okay. I think I'm just about finished.

16 Okay?

17 A. Okay.

18 Q. Did you ever take any programming or web  
19 design classes in high school?

20 A. I did.

21 Q. Do you remember what those classes were  
22 called?

23 A. Web Design I and II.

24 Q. Who was your teacher?

25 A. Mr. Campbell.



1 Q. Yeah? Did you enjoy those classes?

2 A. Yes. Those were fun.

3 Q. Those were fun?

4 A. Uh-huh.

5 Q. Did you do well in those classes?

6 A. I did.

7 Q. What kind of things did you have to do in  
8 Web Design I and II?

9 A. We built websites with codes.

10 Q. Yeah?

11 A. Yes.

12 Q. Those were fun?

13 A. Those were fun. Decorating, the colors  
14 of the websites.

15 Q. Did you make yourself a website?

16 A. Like, we did assignments where we did  
17 different computer websites, yes.

18 Q. Yeah?

19 A. Yeah.

20 Q. Do you have a website now?

21 A. I do have an art shop.

22 Q. Yeah? Is it an Etsy shop?

23 A. It's a Fine Art America shop. And if you  
24 type in "Maggie Russell," there's all my art.

25 Q. Okay. So you sell art on a website?



1 A. Yes, ma'am.

2 Q. Okay. Do you make money from selling  
3 that art?

4 A. Very little.

5 Q. Do you know how much?

6 A. No, ma'am.

7 Q. Did you say Fine Art America?

8 A. Yes, ma'am.

9 Q. Did you talk to Ms. Aimee about the  
10 Visual Basic programming class?

11 A. Yes.

12 Q. What did she tell you about that class?

13 A. She explained to me what was in the  
14 Visual Basic programming, like what kind of math it  
15 had in it and that kind of stuff.

16 Q. Okay. Did anyone tell you you couldn't  
17 do that class?

18 A. No.

19 Q. Okay. Do you think you're capable of  
20 completing that class?

21 A. No.

22 Q. Why not?

23 A. Because when I look at numbers, it's like  
24 the Salvador Dali painting with the melting clock  
25 numbers. That's my head. That's how I see all of



1 my math. It's just an endless number of alphabet  
2 soup to me.

3 Q. Okay. Has it always been like that?

4 A. Yes, ma'am.

5 Q. But you've managed to complete some math  
6 classes, right?

7 A. Some.

8 Q. Did you talk to Mom about not -- about  
9 taking Visual Basic programming?

10 A. Yes.

11 Q. What did Mom say?

12 A. She told me that -- too much math. She  
13 was right. It was too much math in there.

14 Q. Based -- too much math based on what?

15 A. Based -- I'm sorry. I'm -- I don't --

16 Q. How do you know there was too much math?

17 A. Because of the number of -- I'm sorry. I  
18 don't understand the question.

19 Q. So you said there was too much math in  
20 Visual Basic programming. But you never took that  
21 class, right?

22 A. Right.

23 Q. You never signed up for it?

24 A. No.

25 Q. So you don't know --



1 MR. ALTMAN: Relax. It's okay. Just  
2 calm down.

3 Give her a second.

4 MS. BROWN: Sure.

5 MR. ALTMAN: Just relax. Keep answering  
6 the questions like you've been doing.

7 MS. BROWN: You're doing great.

8 THE WITNESS: Okay.

9 MS. BROWN: Deep breath.

10 THE WITNESS: Okay.

11 MS. BROWN: Are you ready?

12 THE WITNESS: I'm ready.

13 MS. BROWN: Okay.

14 BY MS. BROWN:

15 Q. You don't know how much was in Visual  
16 Basic programming, do you?

17 A. No, ma'am.

18 Q. Okay. Did somebody tell you you couldn't  
19 do that class?

20 A. No, ma'am.

21 Q. Okay. We're here because you filed a  
22 lawsuit against MGCCC.

23 A. Yes, ma'am.

24 Q. And in that lawsuit, you say they  
25 discriminated against you.



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 50

1 A. Yes, ma'am.

2 Q. Tell me how they did that.

3 MR. ALTMAN: Objection; form. You can  
4 answer.

5 A. One of the things was after I talked to  
6 Mr. Bonfanti about some math, all of a sudden they  
7 wouldn't let me see Ms. Aimee. When we went to  
8 Ms. Aimee's office, I won't forget the moment she  
9 said I couldn't come in.

10 BY MS. BROWN:

11 Q. When was that?

12 A. It was like around 2018.

13 MR. ALTMAN: Calm down. It's okay.  
14 Just keep talking. You're doing good.

15 A. That's just one of the things I remember.

16 BY MS. BROWN:

17 Q. So you had been to see Dr. Bonfanti?

18 A. Yes.

19 Q. Was this after the OCR complaint?

20 A. I believe so.

21 Q. And you talked to him about your  
22 resolution --

23 A. Math disabilities.

24 Q. Okay. And after you saw Dr. Bonfanti,  
25 you tried to go see Ms. Aimee?



1 A. Yes.

2 Q. And she told you she couldn't talk to  
3 you?

4 A. Correct.

5 Q. Okay. Do you know why she told you that?

6 A. She told me that we couldn't talk about  
7 math anymore or anything.

8 Q. But she didn't tell you why?

9 A. No.

10 Q. Okay. That was one of the reasons you  
11 said they discriminated. Are there others?

12 A. I feel like -- hold on. Let me breathe  
13 for a minute.

14 Q. Take your time.

15 A. All right. I'm ready.

16 Q. Okay.

17 A. Another reason I feel like they  
18 discriminated against me is because they never  
19 reduced the number of questions on my paper.

20 Q. In what class?

21 A. Mostly Beginning Algebra, Intermediate  
22 Algebra, and College Algebra. All of them had the  
23 same numbers of questions. Like, I remember one  
24 test had 40 questions, when it was supposed to be  
25 reduced to like 20 or ten questions.



1           Q.    Who told you it was supposed to be 20 or  
2    ten questions?

3           A.    From my accommodations.

4           Q.    Okay.  That you requested?

5           A.    Yes.

6           Q.    Was it in writing that they were supposed  
7    to be ten or 20 questions?

8           A.    It was in writing.

9           Q.    From whom?

10          A.    I don't know who; but I just remember the  
11   writing.

12          Q.    Anything else that you say is  
13   discrimination?

14          A.    Besides those, that's all I can remember.

15          Q.    Do you still want your associate's degree  
16   from Mississippi Gulf Coast Community College?

17          A.    Yes.

18          Q.    Are you willing to take one more class to  
19   do that?

20          A.    No, ma'am.

21          Q.    All right.  I think if we can take a  
22   quick break --

23          A.    Okay.

24          Q.    -- we're just about finished.

25          A.    Okay.



1 (Off the record.)

2 BY MS. BROWN:

3 Q. I think two more questions.

4 A. Okay.

5 Q. Okay? You're doing good?

6 A. Doing good.

7 Q. You're doing great so far.

8 A. Okay.

9 Q. Recently, after you filed this lawsuit,  
10 we talked some more about an additional  
11 accommodation. Do you remember that?

12 A. No, ma'am.

13 Q. Were you ever told about another course  
14 you could take that you could do at your own pace?

15 A. No.

16 Q. Okay. Don't have any knowledge about  
17 that?

18 A. I don't remember.

19 Q. Okay. Do you know that the college is  
20 willing to let you come do one of those two courses  
21 and not charge you for it to finish your degree?

22 A. I -- no, ma'am.

23 Q. You didn't know that?

24 A. I don't remember.

25 Q. You don't remember that? Okay.



MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
Maggie Russell - 03/29/2023

Page 54

1           **That's all I have, Maggie.**

2     A.     Okay.

3     **Q.     You did awesome.**

4     A.     Thank you.

5           MR. ALTMAN:   Good job, Maggie.

6           THE WITNESS:   Thank you.

7           (Deposition concluded at 11:24 a.m.)

8                           - - -

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25



## 1 CERTIFICATE OF COURT REPORTER

2 I, Kati Vogt, RPR, RMR, CRR, RDR, Court  
3 Reporter and Notary Public in and for the County of  
4 Harrison, State of Mississippi, hereby certify:

5 That on the 29th day of March, 2023, there  
6 appeared before me MAGGIE RUSSELL;

7 That I placed the witness under oath to  
8 truthfully answer all questions in this matter  
9 under the authority vested in me by the State of  
10 Mississippi;

11 That the foregoing 54 pages, and including  
12 this page, contain a full, true, and correct  
13 transcript of the testimony of said witness, as  
14 reported by me using the stenotype reporting  
15 method, to the best of my skill and ability.

16 I further certify that I am not in the employ  
17 of, or related to, any counsel or party in this  
18 matter, and have no interest, monetary or  
19 otherwise, in the final outcome of the proceedings.

20 Witness my signature and seal, this the 20th  
21 day of April, 2023.

22

23

24 Kati Vogt, RPR, RMR, CRR, RDR  
My Commission Expires January 4, 2026

25





MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE  
 Maggie Russell - 03/29/2023

Page 56

1 ERRATA SHEET

2 I, MAGGIE RUSSELL, do solemnly swear that I  
 3 have read the foregoing transcript and that the  
 4 same is a true and correct transcript of the  
 5 testimony given by me on the 29th day of March,  
 6 2023, at the time and place hereinbefore set forth,  
 7 with the following corrections:

8 Page: Line: Correction: Reason for  
 9 Correction:

10 \_\_\_\_\_  
 11 \_\_\_\_\_  
 12 \_\_\_\_\_  
 13 \_\_\_\_\_  
 14 \_\_\_\_\_  
 15 \_\_\_\_\_

16 \_\_\_\_\_  
 17 MAGGIE RUSSELL

18 NOTARIZATION

19 Subscribed and sworn to before me, this \_\_\_\_\_  
 20 day of \_\_\_\_\_, 2023.

21 \_\_\_\_\_  
 22 NOTARY PUBLIC

23 MY COMMISSION EXPIRES:

24 \_\_\_\_\_

25